

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

United States of America

v.

MICHAEL BRANDON HOUCK,
a/k/a BRAD HOUCK,

Defendant(s)

Case No. MS-21-63-AMG

FEB 05 2021

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY de DEPUTY

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 6, 2020 to January 7, 2021, in the county of Cleveland in the
Western District of Oklahoma, the defendant(s) violated:

Code Section

18 U.S.C. § 875(c)

Offense Description

Transmitting a communication in interstate commerce containing a threat to
injure another.

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Dustin Merritt, of the Federal Bureau of Investigation which is incorporated and
made a part hereof by reference.☐ Continued on the attached sheet.

Complainant's signature

DUSTIN MERRITT, Special Agent, Federal Bureau of Investigation

Printed name and title

Sworn to before me and signed in my presence.

Date:

2/5/21

City and state:

Oklahoma City, Oklahoma

Judge's signature

AMANDA MAXFIELD GREEN, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

**AFFIDAVIT IN SUPPORT OF
COMPLAINT AND ARREST WARRANT**

I, Dustin Merritt, Special Agent with the Federal Bureau of Investigation, being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), where I investigate violations of federal criminal law. I have been a Special Agent with the FBI since 2018. I am currently assigned to the Joint Terrorism Task Force of the Oklahoma City FBI office. During my career, I have conducted investigations involving violations of federal criminal law relating to, but not limited to, counterterrorism, national security, possession and use of weapons of mass destruction, and firearms-related offenses.

2. I have personally participated in the investigation set forth below. The facts in this Affidavit come from my personal observations, my review of documents related to this investigation, oral and written communications with others who have personal knowledge of the events and circumstances described herein, a review of public source information including information available on the Internet, my training and experience, and information obtained from other agents and witnesses. This Affidavit is intended to show there is sufficient probable cause for the requested complaint and arrest warrant, but does not set forth all of my knowledge about this matter.

3. Based on my training and experience and the facts set forth in this Affidavit, I believe there is probable cause to believe that **Michael Brandon HOUCK (HOUCK)** has transmitted in interstate commerce a communication containing a threat to injure another in violation of Title 18 U.S.C. § 875(c).

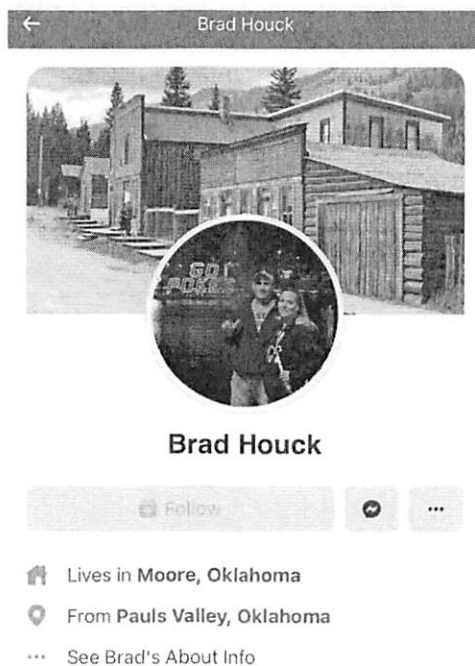
In support thereof, your Affiant states the following:

INVESTIGATION TO DATE

4. On January 8, 2021, FBI Oklahoma City Joint Terrorism Task Force (JTTF) received information from Detective Tony Towery (Det. Towery) with the Moore Police Department (MPD) in reference to a complaint received by MPD about concerning remarks by user @Bradhouck¹ on a social media platform known as Parler.² Det Towery provided two screenshots of concerning posts on Parler, as well as a screenshot of a Facebook profile facebook.com/bhouck2600 and UID 100000367044363. The concerning statements on Parler included two posts from January 7, 2021:

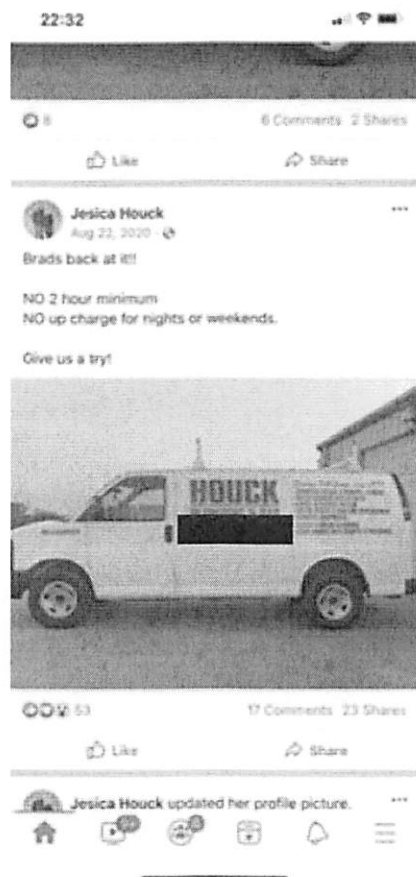
¹ Based on the totality of the facts known to investigators, it is believed that **Michael Brandon HOUCK** utilizes and is commonly known by the name “Brad.”

² In 2018, Parler, LLC launched the privacy-focused, microblogging and social networking platform “Parler.”² Parler can be accessed via the web at “https://www.parler.com” or can be downloaded as an application on a mobile device via Google’s Play Store or Apple’s App Store. In order to make comments and post content on Parler’s network, a new user—or “Parleyer”—must create a Parler account. The account creation process involves the new user providing Parler with an email address and phone number, as well as a password. After creating the account, the user may update his or her account information with a profile photo and may choose other Parler accounts, such as news networks or individuals, to follow.



5. FBI Oklahoma City contacted with Oklahoma Highway Patrol (OHP) to identify Brad Houck through driver's license records maintained by the State of Oklahoma. FBI was provided with the following identifying information, which matched name and photograph to **Michael Brandon HOUCK**, date of birth XX/XX/1970, Oklahoma driver's license number XXXXXXXXXX, address XXXXX XXXXXXXX XXXXX XX, Norman, Oklahoma 73071. **HOUCK** was described as a white male, 5'8" tall, weighing 200 pounds. OHP also located the Parler comments from **HOUCK** that were previously sent to MPD. A screenshot from OHP identified a Facebook posting by Jesica Houck on August 22, 2020, stating "Brads back at it!!" The telephone number listed on the van in the post is 405-XXX-XXXX.³

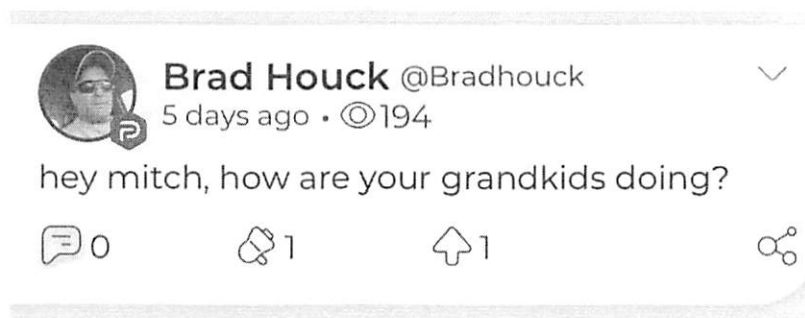
³ **HOUCK's** date of birth, driver's license number, address, and telephone number are known to FBI, but have been redacted to protect his personal information.

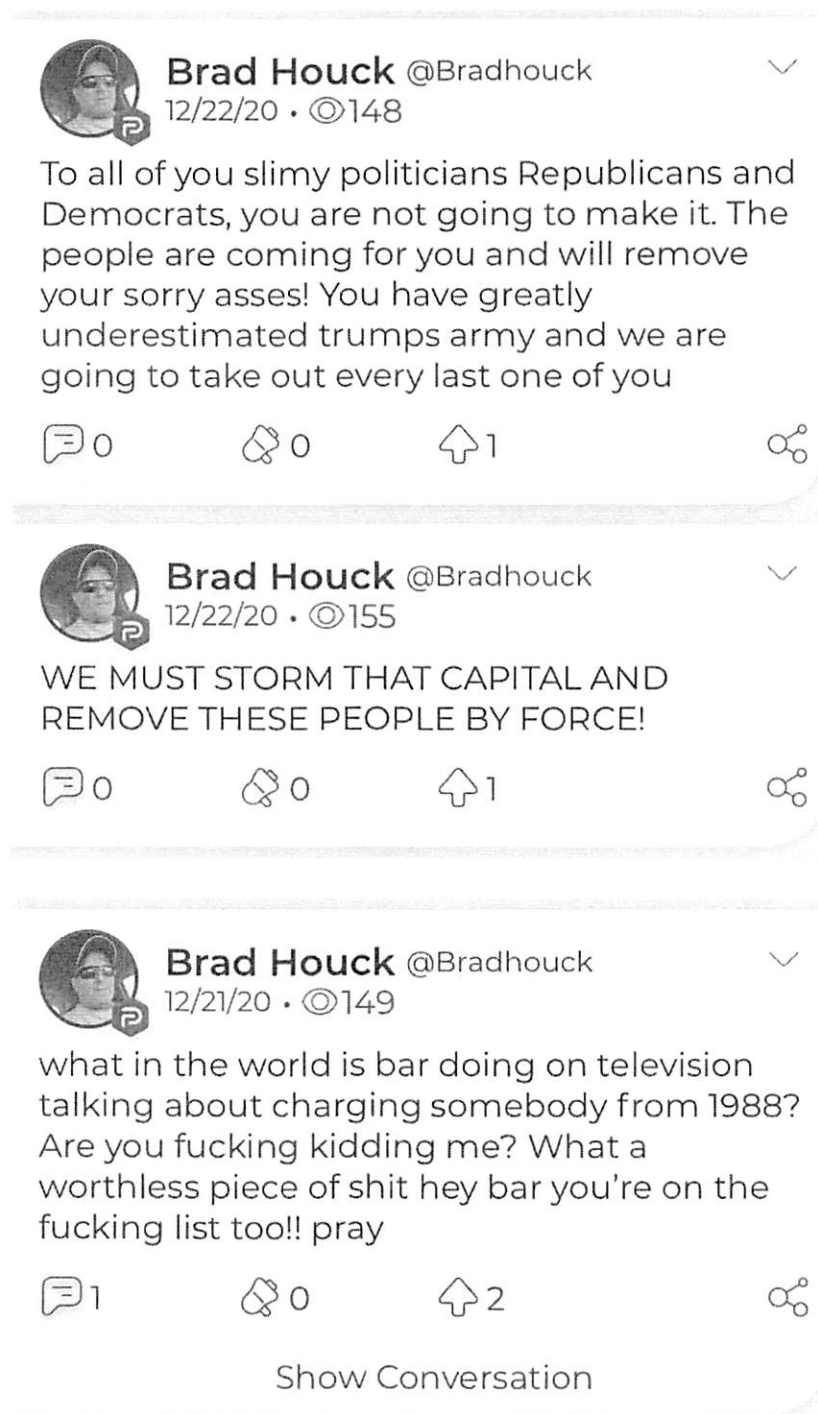


OHP also located the below Parler post from January 6, 2021:

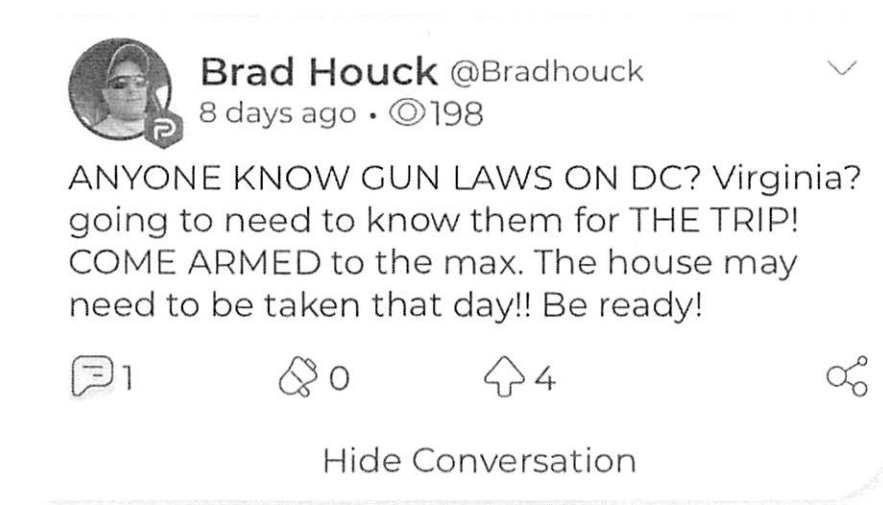
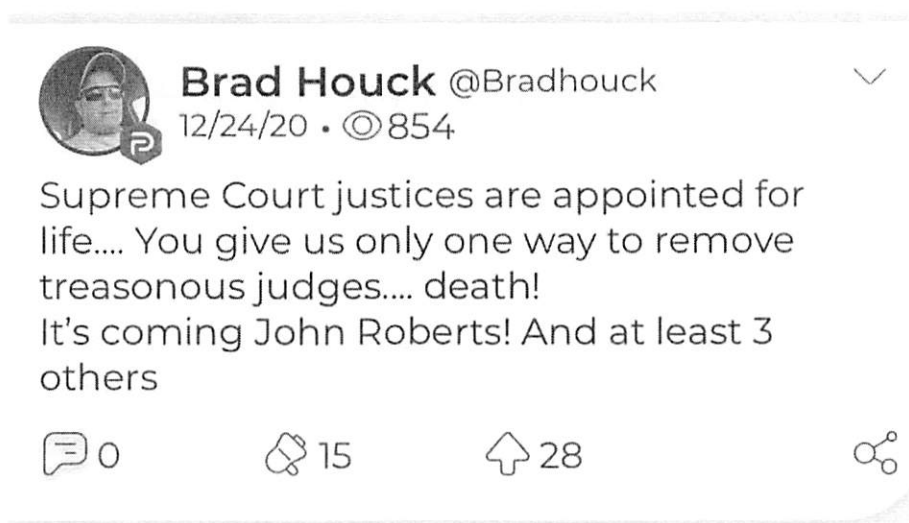


6. On January 8, 2021, FBI Oklahoma City queried the Oklahoma City Police Department for any information related to **HOUCK**, and was provided additional Parler screenshots from @Bradhouck that were made on December 21st and December 22nd, 2020, and January 3rd and 4th, 2021:





7. On January 8, 2021, and January 9, 2021, FBI Oklahoma City conducted screen captures of posts made by @Bradhouck on his publicly available Parler account:



8. On January 9, 2020, a voluntary disclosure of customer communications or records issued to Parler, LLC identified the account @Bradhouck, user ID 2329569, UUID 16c28d125ca94a44a866820380951475, was created on June 30, 2020, using email address mbhouckcattle@gmail.com, signup IP address of 136.228.101.92, and phone number 405-XXX-XXXX.⁴ An open source query of the phone number 405-XXX-XXXX identified this telephone number as a mobile device managed by AT&T Wireless under the name

⁴ This is the same telephone number referenced in paragraph 5.

Michael Brandon Houck, XXXXX XXXXXXXX XXXX XX, Norman, Oklahoma 73071. The phone number was also listed above in Jesica Houck's Facebook post referencing "Brad" and the company Houck Plumbing and Gas. An open source search for Houck Plumbing and Gas identified facebook.com/Houckplumbingok and @Houckplumbingok.

9. **HOUCK's** threats mention United States Supreme Court Chief Justice John Roberts' "adopted" children. Your affiant has learned that there is public information about Chief Justice Roberts and his wife having adopted two children.⁵

10. On January 10, 2021, a United States Magistrate Judge for the Western District of Oklahoma, signed a search warrant for **HOUCK's** residence. On January 11, 2021, at approximately 6:00 am, law enforcement arrived at **HOUCK's** residence to execute the search warrant. Upon arrival, agents announced themselves from a short distance over a public announcement (PA) speaker as FBI and announced that they had a search warrant for **HOUCK's** residence. Agents called for **HOUCK** by name to exit the residence. Several minutes elapsed with no response from inside the house. Agents then approached the residence while continuing to announce over the PA their identity and that they had a search warrant. Even after approaching the house, law enforcement received no response from inside the house. Only after breaching the house via a window did agents make verbal contact with **HOUCK**. Agents continued to announce their identity and the purpose of their presence. However, **HOUCK** retreated further into the house. **HOUCK** eventually exited the front door smoking a cigarette. Although agents were giving verbal

⁵ For example, see, https://en.wikipedia.org/wiki/John_Roberts, last visited January 10, 2021.

commands for **HOUCK** keep his hands raised, **HOUCK** repeatedly lowered his hands. Despite agents ordering him to approach them with his hands up, **HOUCK** told agents to come to him. Agents again told **HOUCK** to come to them with his hands up. Eventually, **HOUCK** approached agents and asked them if this was about “the posts.”

11. During the search of **HOUCK**’s residence, agents found approximately twenty-four firearms, thousands of rounds of ammunition of various calibers, \$4800 in cash, and several personal electronic devices.

12. On January 11, 2021, agents interviewed **HOUCK**’s wife. Agents showed her the above posts. She denied having seen them previously, but she stated the posts crossed the line of what she believed was acceptable. Additionally, **HOUCK**’s wife stated that **HOUCK** had not traveled to Washington, D.C. on or about January 6, 2021.

13. On January 11, 2021, two identified individuals (Individual #1 and Individual #2) told agents they were with **HOUCK** at his house on Saturday night, January 9, 2021, playing dominoes. They told agents that **HOUCK** bragged about being banned from both Parler and Facebook for his posts. Individual #2 warned **HOUCK** about his posts not being within his rights. Both Individual #1 and Individual #2 thought the posts were threatening.

14. On January 10, 2021, a United States Magistrate Judge for the Western District of Oklahoma, signed a search warrant for **HOUCK**’s Parler account @Bradhouck, user ID 2329569, UUID 16c28d125ca94a44a866820380951475. The search warrant was sent to Parler on January 10, 2021, and the results were received on January 25, 2021. The

following posts/comments were discovered during the search of **HOUCK's** Parler account @Bradhouck, user ID 2329569, UUID 16c28d125ca94a44a866820380951475:

- “James Lankford from Oklahoma is a sorry motherfucker and will pay for his treasonous lack of action. Better keep your family close James” (01/07/2021)
- “They’ve only got two choices we can shoot them or the government can hang them. Oh wait there’s a third choice, you can send them to my house and I will Waterboard them for the next five years, then kill them” (12/06/2020)
- “Damn straightWe just need to get the address of that cocksucker George W. Bush. That ranch will be easy to get to and take over. We need to get moving and get the stuff started” (12/25/2020)
- “GWB is a dead man ...we will find you georgie boy” (12/06/2020)⁶
- “Fuck you Schumer we are going to come find you and have a little fun with you but make no mistake about it you’re the devil and we are going to kill you” (01/04/2021)⁷
- “Fucking DO SOMTHING! We the people are fixin to EXPLODE! When

⁶ Based on the totality of the circumstances known to investigators, I believe that “GWB” is former President George Walker Bush. It is public knowledge that President Bush has a ranch in McLennan County, Texas. For example, see, https://en.wikipedia.org/wiki/Prairie_Chapel_Ranch, last visited February 4, 2021.

⁷ Based on the totality of the circumstances known to investigators, I believe that “Schumer” refers to United States Senator Chuck Schumer.

we do , it will not stop , no talking, no discussions, we will keep it up until every last player in this is dead! We are going to kill all of you sorry ass politicians! All 535.” (01/04/2021)

- “shoot his ass!!! someone going to catch him or his children or his wife out of the house! guess what Brad..... we are starting with what’s deafest to you!!!” (01/04/2021)
- “Time to go after their families! We have to get dirty and I mean now! Start with the kids then the wives eliminate their families and they will give up and talk” (01/04/2021)
- “We need to stop talking and start shooting. Come on people just won’t get resolved with peaceful protest in.” (01/06/2021)
- “Lindsey Graham is a piece of shit he needs to hang with all the rest of them” (12/07/2020)
- “Stfu Lindsey! We are going to find you and kill your ass! You are full of chinese money!” (01/03/2021)⁸
- “He’s a gay little Trader and we’re going to find you Lindsay pull your eyeballs out and let you run around for the rest of your life like that” (01/04/2021)

⁸ Based on the totality of the circumstances known to investigators, I believe that “Lindsey” refers to United States Senator Lindsey Graham.

CONCLUSION

15. Based on the aforementioned information, I believe there is probable cause to believe that **Michael Brandon HOUCK** communicated a threat to injure another transmitted in interstate commerce in violation of 18 U.S.C. § 875(c). Specifically, **HOUCK** transmitted the following threats:

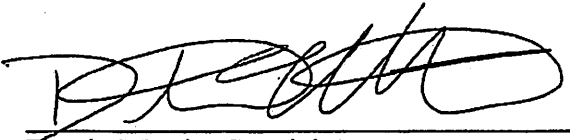
- a. On December 6, 2020, **HOUCK** threatened President George W. Bush by transmitting: “GWB is a dead man ...we will find you georgie boy;”
- b. On December 24, 2020, **HOUCK** threatened United States Supreme Court Chief Justice John Roberts by transmitting: “Supreme Court justices are appointed for life.... You give us only one way to remove treasonous judges.... death! It’s coming John Roberts! And at least 3 others;”
- c. On January 3, 2021, **HOUCK** threatened United States Supreme Court Chief Justice John Roberts by transmitting: “Hey justice Roberts, we are coming for you and your illegal adopted kids!! finished! they will get to watch you hang;”
- d. On January 3, 2021, **HOUCK** threatened United States Senator Lindsey Graham by transmitting: “Stfu Lindsey! We are going to find you and kill your ass! You are full of chinese money!”
- e. On January 4, 2021, **HOUCK** threatened United States Senator Chuck Schumer by transmitting: “Fuck you Schumer we are going to come find

you and have a little fun with you but make no mistake about it you're the devil and we are going to kill you;" and

- f. On January 7, 2021, **HOUCK** threatened United States Senator James Lankford by transmitting: "James Lankford from Oklahoma is a sorry motherfucker and will pay for his treasonous lack of action. Better keep your family close James."

16. It is therefore requested that a complaint and arrest warrant issue for the offense listed above.

FURTHER YOUR AFFIANT SAYETH NOT.



Dustin Merritt, Special Agent
Federal Bureau of Investigation

SUBSRIED AND SWORN to before me this th5 day of February, 2021.



AMANDA MAXFIELD GREEN
UNITED STATES MAGISTRATE JUDGE